

Amendments to the Drawings

Figures 1 and 2 have been labelled as prior art. Replacement sheets reflecting the amendments to Figures 1 and 2 are attached.

REMARKS

Applicants have received the Office Action dated October 16, 2008, in which the Examiner: 1) objected to the Figures 1 and 2; 2) objected to the Specification, specifically the Title and the Abstract; 3) objected to Figures 1 and 2; 4) objected to the claims; 5) rejected claims 1-6, 8-9, and 13-14 under 35 U.S.C. §103(a) as obvious under Estakhri (U.S. Patent No. 6,081,878) in view of Koh (U.S. Patent Publication No. 2003/0167376); 6) rejected claim 7 as obvious under Estakhri in view of Koh and EverythingUSB (USB 2.0 FAQ-Information-Drivers); 7) rejected claims 10-11 as obvious under Estakhri in view of Koh and in view of Yamazaki (U.S. Patent No. 5,569,297); and 8) rejected claim 12 as obvious under Estakhri in view of Koh, in view of Yamazaki, and in view of Hasbun (U.S. Patent No. 5,581,723). With this response, Applicants amend all pending claims. Based on the amendments and arguments contained herein, Applicants respectfully submit that all pending claims are in condition for allowance.

I. Figures 1 and 2

Figures 1 and 2 have been designated as "prior art" as requested by the Examiner.

II. Objection to Title and Abstract

Applicants amend the Title and the Abstract as requested by the Examiner.

III. Claim objections

Applicants amend the claims to address the Examiner's concerns.

IV. Art rejections

The Examiner has asserted that claim 1 is obvious in light of US 6,081,878 ("Estakhri") and US 2003/0167376 ("Koh"). Applicants respectfully submit, however, that the Examiner is incorrect in this assertion. The present claim 1 requires the claimed device to be limited by the feature of the master control unit being "arranged to transmit

a signal simultaneously to the at least two NAND flash memory units which causes the erasure of a section of memory space of each of the at least two NAND flash memory units”.

In contrast to the present claim 1, neither Estakhri nor Koh discloses any master control unit arranged to transmit an erasure signal simultaneously to at least two flash memory chips. For this reason at least, a skilled person taking Estakhri and Koh – either alone or in combination – would not have been led by their teachings to arrive at the claimed invention defined by claim 1.

In fact, Estakhri actually teaches that its controller is arranged to erase the first and second flash memory chips sequentially, rather than sequentially. Evidence for this is found in column 19, lines 27-29 of Estakhri, which teaches that a first “erase set” command (Figure 14: “60H”) is sent to the first flash memory chip at time E0, and in column 20, lines 7-9, which teaches that a second “erase command signal” (Figure 14: “60H”) is sent to the second flash memory chip at a later time E11. Thus, it is seen that the controller of Estakhri is arranged to erase the first and second flash memory chips sequentially instead of simultaneously, and thus, the teaching of Estakhri teaches the skilled person away from the claimed invention.

By transmitting the erasure signal simultaneously (rather than sequentially) to the at least two NAND flash memory units, embodiments of the claimed invention can perform faster WRITE operations compared with the same operations as performed by the devices of Estakhri, for example.

For at least these reasons, Applicants submit that claim 1 is not obvious over Estakhri and Koh, either alone or in combination. Accordingly, claim 1 is patentable over these documents.

The two other documents US 5,699,297 (“Yamazaki”) and US 5,581,723 (“Hasbun”) were cited by the Examiner against the dependent claims, and thus it is believed that there is no need to elaborate on them. At any rate, neither Yamazaki nor Hasbun discloses any master control unit arranged to transmit an erasure signal simultaneously to at least two NAND flash memory units. Thus, the skilled person would

not have arrived at this claimed invention even if he had further consulted their teachings either alone or in combination.

Similar comments also apply to the corresponding method claim 13, which is thus also patentable over Estakhri and Koh. The dependent claims, by virtue of their dependencies at least, are also patentable over the cited documents.

Applicants respectfully request that a timely Notice of Allowance be issued in this case. It is believed that no extensions of time or fees are required, beyond those that may otherwise be provided for in documents accompanying this paper. However, in the event that additional extensions of time are necessary to allow consideration of this paper, such extensions are hereby petitioned under 37 C.F.R. § 1.136(a), and any fees required are hereby authorized to be charged to Conley Rose, PC's Deposit Account No. 03-4729.

Respectfully submitted,

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